

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII
THE ESTATE OF ERIK A. POWELL,) Civil No.
THROUGH PERSONAL REPRESENTATIVE) CV04-00428LEK
MARY K. POWELL; THE ESTATE OF)
JAMES D. LAUGHLIN, THROUGH PERSONAL)
REPRESENTATIVE RAGINAE C. LAUGHLIN;)
MARY K. POWELL, INDIVIDUALLY;)
RAGINAE C. LAUGHLIN, INDIVIDUALLY;)
CHLOE LAUGHLIN, A MINOR, THROUGH)
HER NEXT FRIEND, RAGINAE C.)
LAUGHLIN,)
Plaintiffs,)
vs.)
CITY AND COUNTY OF HONOLULU,)
Defendant,)
and)
CITY AND COUNTY OF HONOLULU,)
Third-Party Plaintiff,)
vs.)
UNIVERSITY OF HAWAII, a body)
corporate; JOHN DOES 1-10, JANE)
DOES 1-10; DOE CORPORATIONS and)
DOE ENTITIES,)
Third-Party Defendants.)

DEPOSITION OF JAMES HOWE
Taken on behalf of Plaintiffs at the Law Offices
of Ian L. Mattoch, 737 Bishop Street, Suite 1835,
Honolulu Hawaii, commencing at 10:00 a.m. on
October 16, 2006, pursuant to Notice.

Before: WILLIAM T. BARTON, RPR, CSR NO. 391

EXHIBIT "27"

1 date. But, I mean, we can find that. But I know

2 that through the process, that a determination was

3 made to add additional lifeguard service.

4 Q. In the year 2002, did you ever ask for

5 additional lifeguard support, existing lifeguard

6 support, for instance, transfers from other parks?

7 A. I'm sorry?

8 Q. In the year 2002, did you ever request

9 that lifeguards from other parks be

10 transferred temporarily to Hanauma Bay?

11 A. No.

12 Q. What do you attribute the 12 drownings,

13 excessive amount of drownings at Hanauma Bay in

14 2002 to?

15 MR. MAYESHIRO: Objection. Lacks

16 foundation. Calls for speculation.

17 A. In terms of looking at the analysis that

18 we did, we discovered --

19 Q. Let me stop you right there.

20 Prior to that analysis, which I take it

21 was done after the year 2002, that you're talking

22 about the task force?

23 A. Well, there was ongoing analysis that

24 was -- again, I can't tell you the specific dates.

25 I'd have to get an actual calendar or something to